UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) CRIMINAL NO. 04-10306-PBS
)
TREVOR CHARLTON)

MOTION TO ENLARGE TIME

The government respectfully moves for an enlargement of time of one business day to file its opposition to the defendant's suppression motion, from June 3, 2005 to and including June 6, 2005. As grounds therefor, undersigned counsel states that, since the parties' appearance before the Court in this matter, he has been engaged in filing a brief with the First Circuit, responding to several motions in other sessions of this Court, and attempting to deal from a distance with a criminal matter pending in the District of Maine that has been assigned to undersigned counsel in light of the recusal of the Maine U.S. Attorney. Accordingly, the additional time requested is necessary in order to provide the Court with an opposition that will assist the Court in resolving the issues raised by the defendant's motion.

The government has attempted to learn the defendant's position on this motion but has been unable to do so given that

defendant's attorney is currently away from the office on travel.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

By: <u>/s/Robert E. Richardson</u>
Robert E. Richardson
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts June 3, 2005

I, ROBERT E. RICHARDSON, hereby certify that I have caused a true copy of the foregoing to be served by electronic filing on J. Martin Richey, Federal Defender Office, 408 Atlantic Avenue, $3^{\rm rd}$ Floor, Boston, MA 02210.

/s/Robert E. Richardson ROBERT E. RICHARDSON Assistant U.S. Attorney